

353 N. CLARK STREET CHICAGO, IL 60654-3456

JENNER & BLOCK LLP

December 19, 2022

VIA ECF

The Honorable P. Kevin Castel
United States District Judge
500 Pearl Street, Courtroom 11D
New York, NY 10007

Peter J. Brennan
Tel +1 312 222 9350
Fax +1 312 527 0484
PBrennan@jenner.com

Re: *Moon v. Kia America, Inc.*, Case No. 1:22-cv-07433-PKC
Unopposed Letter Motion

Dear Judge Castel:

We represent Defendants Kia America, Inc., Hyundai Motor America, and Hyundai America Technical Center, Inc. (collectively, "Defendants") in the above-referenced action. We write to respectfully request a stay of all deadlines, including all pleading deadlines, in the above-referenced action. Counsel for Plaintiff Stacie Moon ("Plaintiff") does not oppose this request. The Court recently vacated an Initial Pretrial Conference set for January 6, 2023 for the same reasons outlined below (*see* ECF No. 18; *see also* ECF Nos. 16, 17).

Defendants' current deadline to respond to the complaint is December 20, 2022. On December 13, 2022, the U.S. Judicial Panel on Multidistrict Litigation (the "Panel") issued an order in MDL No. 3052 transferring sixteen (16) related actions, including the instant action, to the Honorable James V. Selna in the Central District of California for coordinated or consolidated proceedings. Attached as **Exhibit 1** is a true and correct copy of the Transfer Order.

Pursuant to this Transfer Order, the Parties believe that transfer has been completed for certain related actions and is currently underway for other related actions. The Parties anticipate that the transferee district court will soon be issuing an order that, among other things, sets a new schedule, with new deadlines, for all related actions.

In light of the foregoing, the parties have agreed that it is reasonable and judicially efficient to stay any and all deadlines, including pleading deadlines, in the instant action. Defendants therefore respectfully move the Court to stay all deadlines, including all pleading deadlines, in the above-referenced action.

Respectfully submitted,

/s/ Peter J. Brennan

Peter J. Brennan